

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CITY OF ALMATY, KAZAKHSTAN and BTA
BANK JSC,

Crossclaim Plaintiffs,

- against -

MUKHTAR ABLYAZOV, VIKTOR
KHRAPUNOV, ILYAS KHRAPUNOV, and
TRIADOU SPV S.A.,

Crossclaim Defendants.

ECF Case

No. 15-cv-05345 (AJN) (KHP)

**TRIADOU SPV S.A.'S NOTICE OF MOTION
TO COMPEL AND FOR DISCOVERY SANCTIONS**

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law and Declaration of Deborah A. Skakel in support of Triadou SPV S.A.'s ("Triadou") motion to compel, for discovery sanctions, and to preclude witnesses, dated February 22, 2019, Triadou, by and through its undersigned counsel, will move this Court before the Honorable Katharine H. Parker, at the U.S. District Courthouse for the Southern District of New York, 500 Pearl Street, New York, N.Y. 10007, for an order compelling the production of certain documents improperly withheld as privileged, for sanctions due to discovery misconduct by Plaintiffs the City of Almaty, Kazakhstan and BTA Bank JSC (together, "Almaty/BTA"), to preclude witnesses who were belatedly added to Almaty/BTA's Rule 26(a) disclosures, and granting to Triadou such other, further, and different relief the Court deems just and proper.

Dated: New York, New York
February 22, 2019

Respectfully submitted,

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